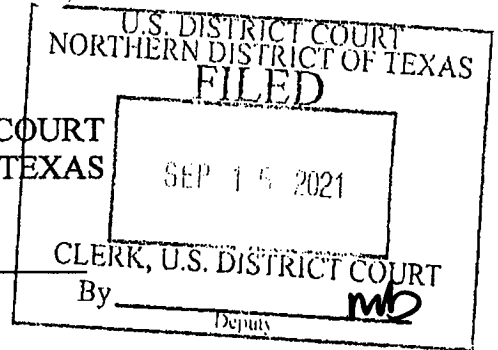


ORIGINAL

SEALED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

AMBROSE SUNDAY OHIDE (01)

UNDER SEAL

CRIMINAL NO.

**3-21CR0437-S**

INDICTMENT

The Grand Jury charges:

Count One

Conspiracy to Commit Wire Fraud

[Violation of 18 U.S.C. § 1349 and 18 U.S.C. § 1343]

1. Beginning at least as early as November 4, 2015, and continuing at least until June 19, 2018, the exact dates being unknown to the Grand Jury, in the Northern District of Texas, and elsewhere, the defendant, **Ambrose Sunday Ohide**, did knowingly combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to commit the following offense, namely, to knowingly and willfully devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing and attempting to execute the scheme to defraud did knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce writings, signs, signals, pictures, and sounds, specifically, wire transfers of funds from romance scam victims into his and co-conspirators' bank accounts, in violation of Title 18, United States Code, Section 1343.

Purpose of the Conspiracy and Scheme to Defraud

2. The purpose of the conspiracy was to: (a) make materially false and fraudulent pretenses, representations, and promises to individuals targeted on dating websites about their identities to induce the targets of the romance scams to send them funds; and (b) use the proceeds received from the romance scams for their own benefit and for purposes other than those represented to the romance scam victims.

Manner and Means of the Conspiracy and Scheme to Defraud

3. It was part of the conspiracy and scheme and artifice to defraud, and among the manner and means by which the defendant and his co-conspirators carried out the conspiracy, that:

- a. Co-conspirators targeted older, often widowed or divorced individuals, with savings, as romantic interests on dating websites such as PlentyofFish.com and Christianmingle.com;
- b. Co-conspirators created false and fraudulent identities and backgrounds on dating websites to appear to be individuals living in the United States to gain the romance victims' confidence and trust;
- c. Co-conspirators often communicated with their romance scam victims through the dating websites as well as via email and text but never met their victims in person;
- d. After developing the romance victims' confidence and trust, the co-conspirators falsely and fraudulently claimed that they were abroad for business, had bills to pay, or owed taxes abroad and then falsely and

fraudulently claimed they were unable to access their bank accounts in the United States;

- e. Co-conspirators then directed the romance scam victims to send money to specific accounts under false and fraudulent pretenses;
- f. Co-conspirators typically removed the funds received from romance scams victim from the account that initially received them within days by making cash withdrawals;
- g. Once a romance scam victim had sent money to one co-conspirator, that victim was often instructed to send money to other co-conspirators;
- h. After the co-conspirators depleted the victims of all funds the victims were able and willing to send, often depleting victims' of their entire savings, the co-conspirators stopped communicating with the victims.

4. It was part of the conspiracy and scheme and artifice to defraud, and among the manner and means by which the defendant and his co-conspirators carried out the conspiracy, that:

- a. On or about November 4, 2015, one or more co-conspirators using the name "Steven Potter" caused romance scam victim whose initials are MB, met through Christianmingle.com, to wire \$40,000 from her Wells Fargo account in North Dakota to an account ending in 6075 at BB&T Bank in Tallahassee, Florida, in the name of Pincin Import and Export LLC, whose sole signatory is **Ambrose Sunday Ohide**, purportedly to meet his payroll;

- b. On or about November 5, 2015, one or more co-conspirators using the name "Steven Potter" caused romance scam victim MB to wire \$5,900 from her Wells Fargo account in North Dakota to an account ending in 6075 at BB&T Bank in the name of Pincin Import and Export LLC controlled by **Ambrose Sunday Ohide**, purportedly for payroll;
- c. On or about November 5, 2015, **Ambrose Sunday Ohide** wired \$36,000 to account ending in 8262 held at Comerica Bank in the name of OCS Motors and withdrew \$9,000 in cash from his account ending in 6075 at BB&T Bank;
- d. On or about June 14, 2018, one or more co-conspirators caused romance scam victim CLB to write a check in the amount of \$32,800.20 from her Bank of America account to CMP Trading Co. and deposit the check into a CMP Trading account ending in 8598 at Bank of America, whose sole signatory is **Ambrose Sunday Ohide**, purportedly to pay for taxes;
- e. Between approximately June 14, 2018, and June 19, 2018, **Ambrose Sunday Ohide**, in eight separate transactions, withdrew \$30,566 from his account ending in 6075 at BB&T Bank.

All in violation of 18 U.S.C. § 1349.

Notice of Criminal Forfeiture

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of any offense violating 18 U.S.C. §§ 1349 and 1343, the defendant, **Ambrose Sunday Ohide**, shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the scheme to defraud.

The property to be forfeited includes, but is not limited to:

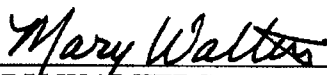
- The property to be forfeited may take the form of a forfeiture “money” judgment; and
- Substitute property as allowed by 28 U.S.C. § 2461(c) and 21 U.S.C. § 853(p).

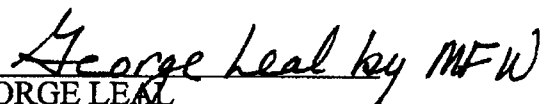
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A TRUE BILL

  
FOREPERSON

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ACTING UNITED STATES ATTORNEY

  
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THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

AMBROSE SUNDAY OHIDE

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SEALED INDICTMENT

18 U.S.C. § 1349 and 18 U.S.C. § 1343  
Conspiracy to Commit Wire Fraud  
(Count 1)

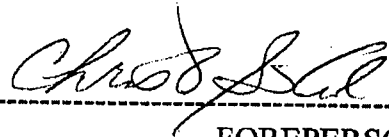
18 U.S.C. § 981 (a)(1)(C) and 28 U.S.C. § 2461(c)  
Forfeiture Notice

1 Count

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A true bill rendered

FORT WORTH

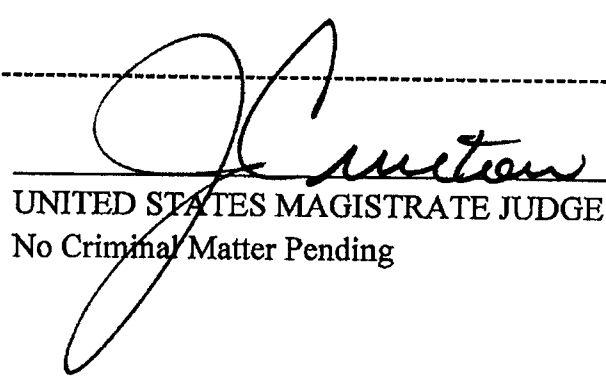
  
FOREPERSON

Filed in open court this 15<sup>th</sup> day of September, 2021.

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Warrant to be Issued

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UNITED STATES MAGISTRATE JUDGE  
No Criminal Matter Pending